

In order to establish a prima facie case of obviousness, all of the claimed limitations must be taught or suggested by the prior art and there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings.

Applicant respectfully submits that the combination of Katseff and Gramlich fails to teach or suggest all of the claimed limitations. For example, Applicant submits that the combination fails to teach or suggest a second (dynamic) server computer running a program for transforming data which program is referred to by an address within a data store connected to the computer network from where the computer program is available for downloading by server computers connected to the computer network.

The Office Action admits that Katseff does not teach this claimed feature. (See section 3, pages 2-3 of the Office Action.) However, the Office Action asserts that “Gramlich teaches a system using multiple servers to employ a remote program for annotating, filtering and transforming data (Gramlich, col. 2, lines 60-63 and col. 5, line 17 - col. 6, line 57).” Applicant respectfully disagrees with this assessment of Gramlich. In fact, what is disclosed in Gramlich is one server (the proxy server 130) running one program (the AOP 114) which includes a number of sub-routines (such as insert, delete, Run_Program), each of which is hard-coded into AOP 114. (Note that even in the case of “Run_Program”, the program identified in the command is one which is “associated” with AOP 114 and is located on the proxy server 130).

However, what Gramlich fails to disclose is “a dynamic proxy server computer being configured to run a program for transforming data, which program is referred to by an address within a data store connected to the computer network from where the computer program is available for downloading by server computers connected to the network.”

The benefit of such system is that new programs can be introduced to the system at any time that an old program can be updated. When a server computer is asked to perform a particular function by another server computer it simply accesses the new program from the given address and executes it. This is not taught or suggested in Gramlich. For example, if a new feature were invented that overlays might want to include, it would be necessary in the system of Gramlich to delete and re-install the AOP with a new improved AOP capable of dealing with the new feature. Moreover, this would have to be done on every proxy server in the system. By contrast, in the present invention, an overlay could simply refer to a new program, for dealing with the new feature, by an address somewhere on the network where the new program is located, the server being configured to run such programs.

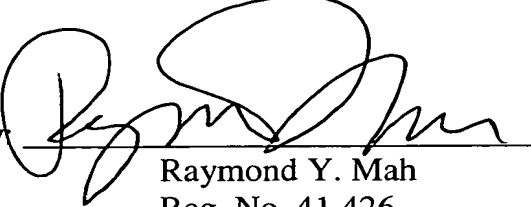
Applicant therefore submits that claims 1-2, 4-8 and 10-11 are not obvious over Katseff and Gramlich and respectfully requests that the rejection of these claims under 35 U.S.C. §103 be withdrawn.

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By 
Raymond Y. Mah
Reg. No. 41,426

RYM/sl
1100 North Glebe Road, 8th Floor
Arlington, VA 22201-4714
Telephone: (703)816-4044
Facsimile: (703)816-4100